

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202-2733

December 11, 2013

Mr. Matt Wickham Pastor, Behling & Wheeler LLC 620 E. Airline Victoria, TX 77901

Re: EPA's Comments on the Draft Technical Scope of Work for AOI-1 Dated November 26, 2013 for the US Oil Recovery Superfund Site

Mr. Wickham

EPA received a Draft USOR Technical Scope of Work for AOI-1 dated November 26, 2013 and Attachment 1 USOR Site History and Sampling Rationale and Figure 6 dated December 3, 2013 via email.

EPA has reviewed the changes and agrees with the following changes

- Addition of Federal and State Natural Resource Trustees as part of the Project Team and in other places in the document where the project team is mentioned.
- Inclusion of the use of additional information obtained during the RI/FS and consideration of observations made during the field investigation.
- Factual revisions to the document that were identified during your final review.
- Additions and changes made to Attachment 1 which includes addition of new sampling locations to the sampling summary tables.
- Revisions to Figure 6 showing the new sampling locations and addition of labels to the aboveground pipeline and lift station in the southern part of the site.

## EPA requests addition of language for following change

 Instead of deleting the paragraph regarding PCBs and dioxins as COPCs please add a statement "Based on the information provided in the Evaluation of Analytical Data Collected for PCBs and Dioxins, dated November 19, 2013, these two classes of contaminants is not included in the list of COPCs for USOR Operations. However, if additional sources of PCBs and dioxins are discovered then this decision will be revisited." If you have questions please contact me at 214-665-8529.

Sincerely,

Raji Josiam

Remedial Project Manager, Superfund Division

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Electronic Copy only via Email Eric Pastor, PBW, LLC Kirby Tyndall, PBW, LLC Patrick Gobb, New Fields Lam Tran, TCEQ Adam Adams, EPA Dipanjana Bhattacharya, EPA Kenneth Shewmake, EPA Carlos Sanchez, EPA